

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

VENUS LABORATORIES, INC., d/b/a )	
EARTH FRIENDLY PRODUCTS, )	
) )	
) )	
Plaintiff, ) )	
) )	No. 15-CV-01617
) )	
v. ) )	
) )	
JOHN VLAHAKIS, ) )	
and ) )	
) )	
EARTHY, LLC, ) )	
) )	
) )	
Defendants. ) )	
) )	

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**VENUS LABORATORIES, INC.'S MOTION FOR  
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiff Venus Laboratories, Inc., d/b/a Earth Friendly Products (“Venus” or the “Company”), by and through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 65, hereby moves this Court for entry of a Temporary Restraining Order and Preliminary Injunction based on its trademark and unfair competition claims. In support of this Motion, Venus relies upon its accompanying Memorandum of Law, Verified Complaint and accompanying exhibits.

WHEREFORE, Plaintiff Venus Laboratories, Inc. requests the following relief:

A. Entry of an Order restraining and enjoining John Vlahakis and Earthy, LLC or its officers, agents, servants, employees, and persons in active concert or participation with it, from advertising, soliciting, marketing, selling, offering for sale or otherwise using the EARTHY trademark in connection with cleaning products and personal products (“Earthy Branded

Products”);

B. Entry of an Order restraining and enjoining John Vlahakis and Earthy, LLC or its officers, agents, servants, employees, and persons in active concert or participation with it, from contacting or otherwise engaging any third parties regarding Earthy Branded Products, including but not limited to the sale of Earthy Branded Products, promoting Earthy Branded Products or holding themselves out as owners or being otherwise associated with Earthy Branded Products.

C. Entry of an Order restraining and enjoining John Vlahakis and Earthy, LLC or its officers, agents, servants, employees, and persons in active concert or participation with it, from attending the Natural Products Expo West 2015 Trade Show to be held March 6-8, 2015 in Anaheim, California or any other tradeshow with the intent to advertise, market, sell, offer for sale or otherwise use the Earthy Branded Products.

D. Entry of an Order restraining and enjoining John Vlahakis and Earthy, LLC or its officers, agents, servants, employees, and persons in active concert or participation with it, from representing themselves as the owners of Earthy Branded Products and executing agreements or attempting to conduct business on behalf of Earthy Branded Products.

E. That the Court grant any further relief deemed warranted and necessary.

Respectfully Submitted,  
VENUS LABORATORIES, INC.

Dated: February 25, 2015

By /s/ Darren S. Cahr

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